

Exhibit 16

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

[1] MISTY WHITE,)
[2] JERMAINE BRADFORD,)
[3] JANARA MUSGRAVE,)
[4] LANDON PROUDFIT,)
[5] BRADLEY BARBER, JR., and)
[6] DAKOTA KAPPUS,)

On behalf of themselves and all)
others similarly situated, and)

[7] OKLAHOMA STATE)
CONFERENCE, NAACP,)

Plaintiffs,)

v.)

[1] HON. PAUL HESSE, in his official)
capacity as presiding District Court)
Judge,)

[2] HON. JACK MCCURDY,)
in his official capacity as District Court)
Judge,)

[3] HON. BARBARA HATFIELD,)

[4] HON. CHARLES GASS,)

[5] HON. KHRISTAN STRUBHAR, in their)
official capacities as Special District)

Judges in the Canadian County District)
Court, and)

[6] CANADIAN COUNTY DISTRICT)
COURT, 26TH JUDICIAL DISTRICT,)

Defendants.)

Case No. _____
(Class Action)

Hon. _____

**DECLARATION OF AMIA TRIGG IN SUPPORT OF MOTION FOR
CLASS CERTIFICATION**

I, Amia L. Trigg, hereby declare under penalty of perjury:

1. I am an attorney at Covington & Burling LLP (“Covington”) and have knowledge of the facts contained in this declaration. Covington is co-counsel for Plaintiffs in the above-captioned litigation, and I submit this declaration which details the qualifications of Covington attorneys in support of Plaintiffs’ Motion for Class Certification.

2. Founded in 1919, Covington has more than 1000 lawyers in offices in Beijing, Brussels, Dubai, Frankfurt, Johannesburg, London, Los Angeles, New York, Palo Alto, San Francisco, Seoul, Shanghai, and Washington, D.C. Covington provides litigation, regulatory, and corporate expertise to help its clients navigate through their most complex legal problems and disputes. Both the firm as a whole and its litigation group are regularly recognized among the nation’s best.

3. Since its founding, Covington has had a strong commitment to public service and pro bono cases. The *American Lawyer* magazine regularly ranks Covington as one of the top three law firms in the country for pro bono work. *Law360* has repeatedly named Covington a Pro Bono Firm of the Year.

4. Covington has effectively and successfully represented other plaintiffs pro bono in class actions, recently in *McBride v. Michigan Department of Corrections*, 2018 WL 1224783 (E.D. Mich. Mar. 9, 2018), a class action challenging inadequate accommodations for deaf and hard of hearing prisoners; *Cab Siquic v. Star Forestry, LLC*, No. 3: 13-cv-00043, 2016 WL 1650800 (W.D. Va.

Apr. 22, 2016), a class action on behalf of migrant agricultural workers who were not paid minimum wage and overtime; *Ortega Melendres v. Arpaio*, 989 F. Supp. 2d 822 (D. Ariz. 2013), a class action challenging the immigration-related policies and practices of the Maricopa County Sheriff's Office; *Floyd v. City of New York*, 959 F. Supp. 2d 540 (S.D.N.Y. 2013), a class action challenging the stop-and-frisk policy of the New York City Police Department; *R.I.L.-R. v. Johnson*, 80 F. Supp. 164 (D.D.C. 2015), a class action on behalf of detained asylum-seekers, and *Ross v. Blount*, No. 19-cv-11076 (E.D. Mich. Apr. 14, 2019), a class action challenging Detroit's bail system.

5. The Covington attorneys involved in representing Plaintiffs include Aaron Lewis, Marta Cook, Laura Beth Cohen, and myself.

6. Aaron Lewis is a partner at Covington. He is admitted to practice in California, the District of Columbia, and Michigan, and has been admitted to the bars of the U.S. Court of Appeals for the Ninth Circuit, the U.S. District Court for the Eastern District of Michigan and the U.S. District Court for the Central District of California. Mr. Lewis graduated from the University of Michigan Law School in 2005 and served as a Law Clerk to the Honorable Ronald M. Gould, U.S. Court of Appeals for the Ninth Circuit, from 2005 to 2006. His practice focuses primarily on White Collar Criminal Defense and Investigations.

7. Marta Cook is an associate at Covington. She is admitted to practice in the District of Columbia and New York. Ms. Cook graduated from the University of Virginia School of Law in 2014 and served as a Law Clerk to the Honorable John

E. Jones III, U.S. District Court for the Middle District of Pennsylvania, from 2014 to 2016. Her practice focuses primarily on White Collar Criminal Defense and Investigations and Anti-Corruption Compliance.


8. Laura Beth Cohen is an associate at Covington. She is admitted to practice in Michigan and her admission is pending in the District of Columbia. Ms. Cohen graduated from the University of Michigan Law School in 2018. Her practice focuses primarily on Insurance Recovery litigation.

9. I am an associate at Covington. I am admitted to practice in California, the District of Columbia and New York, and have been admitted to the bar of the U.S. Court of Appeals for the Fourth Circuit. I graduated from Harvard Law School in 2011 and served as a Law Clerk to the Honorable George B. Daniels, U.S. District Court for the Southern District of New York, from 2011 to 2012, and the Honorable Andre M. Davis, U.S. Court of Appeals for the Fourth Circuit, from 2012 to 2013. My practice focuses primarily on White Collar Criminal Defense and Investigations.

10. Aaron Lewis, Marta Cook, Laura Beth Cohen, and I have been involved in the investigation and preparation of this lawsuit, including developing facts and legal arguments and drafting briefs. We are familiar with the issues, and will zealously represent the plaintiffs and the class. None of us is receiving any reimbursement from the individual plaintiffs or class members in this case; nor is Covington.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9th day of December, 2019.


Amia L. Trigg